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13 *Attorneys for Defendants*  
14 **United HealthCare Insurance Company and**  
**United HealthCare Services**

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 FREMONT EMERGENCY SERVICES  
18 (SCHERR), LTD.;

19 vs.  
20 Plaintiff,

21  
22 UNITEDHEALTHCARE INSURANCE  
23 COMPANY and UNITED  
24 HEALTHCARE SERVICES, INC.,

25 Defendants.

26 CASE NO.: 2:22-cv-01118-CDS-BNW

27  
28 **STIPULATION AND [PROPOSED]**  
**ORDER TO EXTEND DEADLINE**  
**FOR DEFENDANTS' REPLY IN**  
**SUPPORT OF THEIR MOTION TO**  
**STAY DISCOVERY**

**(FIRST REQUEST)**

1 Defendants UnitedHealthcare Insurance Company and United Healthcare  
2 Services, Inc. and Plaintiff Fremont Emergency Services (Scherr), Ltd. (collectively, the  
3 "Parties"), by and through their attorneys of record, hereby stipulate and agree to the  
4 following:

5 1. Defendants filed a Motion to Dismiss Plaintiff's Complaint on September 8,  
6 2022. (ECF No. 29).

7 2. The Parties stipulated and the Court extended Plaintiff's response to the  
8 Motion to Dismiss to October 17, 2022. (ECF No. 36).

9 3. Defendants filed a Motion to Stay Discovery on September 29, 2022.  
10 (ECF No. 40).

11 4. The Parties stipulated and the Court extended Plaintiff's response to the  
12 Motion to Stay Discovery to October 21, 2022, with Defendants' Reply to be due thereafter  
13 on November 4, 2022. (ECF No. 44).

14 5. The Parties stipulated and the Court extended Plaintiff's response to the  
15 Motion to Dismiss to October 21, 2022, with Defendants' Reply to be due on November 9,  
16 2022. (ECF No. 46).

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1       6. Given the overlap between the pending Motion to Dismiss and Motion to  
2 Stay Discovery, the Parties hereby request that **Defendants' Reply to the Motion to Stay**  
3 **Discovery also be due on November 9, 2022.**

4       DATED this 3rd day of November, 2022

5       By: /s/ Renee M. Finch

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19       \*Admitted *pro hac vice*

20       DATED this 3rd day of November, 2022

21       By: /s/ Brianna G. Smith

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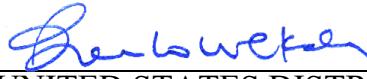
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40       IT IS SO ORDERED:

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42       \_\_\_\_\_  
43       UNITED STATES DISTRICT COURT JUDGE

44       DATED: November 4, 2022

45       CASE NO.: 2:22-cv-01118-CDS-BNW